

Modern Slavery And Human Trafficking Statement

Modern Slavery And Human Trafficking Statement for the Financial Year Ending December 2021

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out Kohler Mira's commitment to ensuring that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Kohler Mira has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Kohler Mira is a manufacturer of bathroom solutions in the residential and commercial markets, including the manufacture of showers, shower enclosures, taps and accessories. Kohler Mira Limited is part of Kohler Co., our ultimate parent company, which has its head office in Wisconsin, USA. Kohler Co. employs around 35,000 employees across 48 manufacturing locations worldwide. The company manufactures approximately 85% of its products in the UK, with the balance being manufactured within Kohler Co. or sourced worldwide, including from the UK, China and the European Union.

Our suppliers

- 152 based in the UK
- 38 based in Europe
- 34 based in Asia
- 5 based in U.S & Canada
- 1 based in rest of world
- Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We operate a number of other policies and codes of conduct to ensure that we are conducting business in an ethical and transparent manner.

These include:

- Anti-bribery
- Supplier Code of Conduct (as part of the Global Procurement policy)
- Supplier Selection
- Corporate Ethics
- Equality and Diversity

Adherence to our values and ethics

Kohler Mira operates a Supplier Code of Conduct which defines our expectations. We will only do business with suppliers who have certified to us that their business practices are lawful, ethical and in compliance with the principles set forth in this Supplier Code of Conduct. This certification is required every 5 years for our direct suppliers. All new direct suppliers also have to pass a rigorous assessment process.

In addition to this, as part of our due diligence processes, Kohler Mira may undertake affirmative measures, such as on-site audits of production factories, to monitor compliance with the Code of Conduct. We will terminate our business relationship with any supplier who violates our Supplier Code of Conduct.

We have an Ethics helpline to encourage associates to report illegal or unethical behaviour. Any matters raised through the helpline or otherwise in accordance with our Corporate Ethics policy will be thoroughly investigated and appropriate action taken where necessary.

Our Modern Slavery and Human Trafficking policy permits taking disciplinary action including dismissal of associates found to be in breach of this policy.

Risk Assessment

Due to the inherent nature of our global supply chain, Kohler Mira has taken steps to reduce the risk of slavery and human trafficking in any organisation that supplies goods and/or services to it, including:

- A Code of Conduct applying to all our suppliers
- On-site assessment and audit of key suppliers and sub-tier suppliers

During 2020 this assessment and audit process has been adapted to utilise virtual approaches where travel has been restricted.

Our effectiveness in combating modern slavery

To measure how effective we've been in ensuring that modern slavery is not taking place in any part of our business or supply chain, we report on the following performance indicators:

- Audits conducted throughout the supply chain and any actions taken as a result
- Staff training undertaken

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our associates as and when required. Our associates are also required to complete annual Ethics training.

Further information

Further information in relation to Kohler Mira, Kohler Co. and our suppliers, along with all our ethics related policies which may also be of interest, can be found on our corporate website. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2021.

Date: 25th July 2022

